

2 UNIVERSITY PLAZA, SUITE 201, HACKENSACK, NJ 07601
T. 201.265.6400 F. 201.265.0303

345 SEVENTH AVENUE, 21ST FLOOR, NEW YORK, NY 10001
T. 646.380.0470 F. 646.380.0471

December 24, 2014

VIA ECF

Hon. Brian M. Cogan
United States District Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Linde v. Arab Bank, PLC*, 04-CV-2799 (BMC)(VVP) and related cases

Dear Judge Cogan:

We write on behalf of the *Linde* and *Coulter* Plaintiffs' counsel to advise the Court of a recent change in circumstances. We were retained today by Michal (a/k/a Mindy) Honickman and the Estate of Howard Goldstein.¹ Mrs. Honickman is the widow of Howard Goldstein, who was killed in the June 20, 2003 Road 60 shooting attack ("Road 60 Attack"). She also serves as his estate's legal representative.

Because the scheduled May 18, 2015 damages trial includes Road 60 Attack damages claims, and given the pre-trial discovery schedule, we felt it appropriate to immediately notify the Court of the existence of these additional prospective plaintiffs. Although we do not believe the addition of these parties will impact the current schedule, after the Christmas holiday we will promptly contact defense counsel to ascertain whether they will consent to their addition as plaintiffs in this case. We will then promptly advise the Court whether, pursuant to Fed. R. Civ. P. 15(a)(2) and 21, and subject to the Court's approval, we believe it is appropriate and efficient to adjudicate their claims as part of the May trial.

Respectfully submitted,

/s/ Gary M. Osen

cc: All counsel

¹ Neither of these newly-retained prospective parties was therefore referenced in the Plaintiffs' submission on December 5, 2014. In fact, counsel had not been in contact with Mrs. Honickman for many years prior to the Court issuing its December 10, 2014 Trial Management Order (*Linde* ECF No. 1197).